



PLEASE TAKE NOTICE that on September 23, 2016, at 11:00 a.m. at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 11B, New York, NY 10007, Lead Plaintiffs Birmingham Retirement and Relief System and KBC Asset Management NV (collectively, “Plaintiffs”), on behalf of the proposed Class,<sup>1</sup> will respectfully move this Court, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for an order (i) granting final approval of the proposed Settlement, which was preliminarily approved by the Court on January 7, 2016; (ii) finding that notice to the Class was provided as required and to the satisfaction of all applicable legal requirements; (iii) finally certifying, for settlement purposes only, the Class of all non-excluded Persons who (a) sold shares of Wyeth contemporaneously with SAC Capital Defendants’ purchases of Wyeth shares during the period January 14, 2008, through and including July 18, 2008 (the “Wyeth Seller Class”); and (b) purchased shares of Wyeth contemporaneously with SAC Capital Defendants’ sales of Wyeth shares during the period July 21, 2008, through and including July 29, 2008 at 4:00 pm EDT (the “Wyeth Buyer Class”); (iv) appointing Wyeth Lead Plaintiffs as Class Representatives and Wyeth Lead Counsel as Class Counsel; and (v) approving the Plan of Allocation for distributing the Net Settlement Fund.

In support of the motion, Plaintiffs submit and are filing herewith: Plaintiffs’ Memorandum of Law in Support of Motion for Final Approval of Settlement and Plan of Allocation, dated August 19, 2016; and the Declaration of Deborah Clark-Weintraub in Support of (A) Plaintiffs’ Motion for Final Approval of Settlement and Plan of Allocation, and (B) Wyeth

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<sup>1</sup> Capitalized terms not defined in this Notice of Motion and Motion have the meaning ascribed to them in the Stipulation and Agreement of Settlement dated December 21, 2015 (the “Stipulation”), filed with the Court on December 23, 2015.

Lead Counsel's Motion for Attorneys' Fees, Reimbursement of Litigation Expenses, and Reimbursement of Plaintiffs' Expenses, dated August 19, 2016, with annexed exhibits.

Respectfully submitted,

Dated: August 19, 2016

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*Lead Counsel and Counsel for Wyeth Lead Plaintiffs  
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*- All Plaintiffs' Counsel consent to the use of their electronic signatures. -*